

Weldon Spring Citizens Commission
7295 Highway 94 South
Saint Charles, Missouri 63304

September 10, 2002

Mr. Ray Plienness
U.S. Department of Energy, Grand Junction Office
2597 B ¾ Road
Grand Junction, Colorado 81503

Dear Ray Plienness:

The Weldon Spring Citizens Commission (WSCC) appreciates the opportunity to review and comment on the *Long-Term Surveillance and Maintenance Program, Long-Term Stewardship Plan for the Weldon Spring Site, Missouri, dated: August 9, 2002*. As you are aware, the Commission was extremely discouraged and disappointed in this version of the document. Nearly all of the information concerning stakeholders and public participation from the previous version was omitted from this document. Many new and old concerns such as Homeland Security, stakeholder input, the "five year review" process, signage, contingencies for the springs, document availability, and contact notification were not addressed in this version.

However, this document does an excellent job of providing a detailed description of site characteristics, history of the site, and final site conditions and includes an improved general discussion of institutional controls (ICs). More details and a schedule for development of each IC will hopefully be provided soon. The Plan also incorporates contingencies for most of the site and action limits for contaminants. However, few, if any, contingencies were included for surface water and springs.

Stewardship is an evolving process that requires the cooperation of all stakeholders to effectively capture and define the key elements for a successful plan. The WSCC believes the experience, insight and knowledge gained by all stakeholders during the past years of intense effort, struggle and sometimes disappointment will direct the path forward. Challenges and opportunities await, but we are confident that an acceptable and effective plan will result from ALL our efforts.

Sincerely

Weldon Spring Citizens Commission

Rick Hampel, Chair
Paul Mydler, Vice-Chair
Deborah Aubuchon
Fritz Hoffmeister
Tom Nelsen
Don Price
Larry Sharp

Attachment

c: Donna Bergman-Tabbert, DOEGJO Manager
Mike Duvall, Saint Charles County Division of Environmental Services Deputy Director
Mimi Garstang, GSRAD Director
Robert Geller, MDNR Hazardous Waste Program, Federal facilities Section, Chief
Don Hooker, USACE Kansas City District
Ted House, Missouri State Senator
Art Kleinrath, DOEGJO Long-Term Stewardship Program Project Manager
Ben Moore, MDNR Hazardous Waste Program Senior Project Manager
Joe Ortwerth, Saint Charles County Executive
Pam Thompson, WSSRAP Project Manager
Dan Wall, EPA-Region VII
Dan Witter, MDOC Policy Coordination Chief

**Weldon Spring Citizen Commission (WSCC) Comments for the
Grand Junction Office, Long-Term Stewardship Plan for the Weldon Spring Site, Missouri
Dated August 9, 2002**

General Comments:

- B-1 | 1. The WSCC has worked diligently and spent a considerable amount of time over the past three to four years reviewing, commenting and discussing successive versions of the Stewardship Plan for the site. During this time, the Commission has developed a long list of comments. The list of previous comments supplied to Ray Plieness of Grand Junction on August 28, 2002 is attached. The Commission asks DOE to review the previous comments, determine whether the comments will or have been addressed in the document, identify for the Commission where the comment is addressed in the document, and if not addressed, provide appropriate justification.

Response B-1: DOE has reviewed previous comments and responses on earlier stewardship plans. Please refer to responses [B-2](#) and [B-56](#). Public participation will also be the focus of the next workshop currently scheduled for Wednesday, October 23.

- B-2 | 2. Section 2 of the July 2001 Stewardship Plan was eliminated. This section concerned the elements of stewardship. The current document does not identify the stakeholders or describe their responsibilities (Table 2-1 in the July 2001 version). The Department of Energy (DOE), Environmental Protection Agency (EPA), the Missouri Department of Natural Resources, (MDNR), the U.S. Army Corps of Engineers (USACE), the Missouri Department of Conservation (MDOC), Missouri Department of Health (MDOH), Missouri Department of Transportation (MDOT), other landowners, St. Charles County, Francis Howell School District, formal and recognized citizen's groups such as the WSCC, the general public and other agencies and groups present at the June 5, 2002 meeting at the site should be identified as stakeholders. At a minimum, DOE should define their perception of the roles and responsibilities for each stakeholder. This discussion should be more detailed than the July 2001 version. Without a discussion of stakeholder responsibilities, stakeholders will not play an active and continuing role in stewardship at the site and without stakeholder involvement, stewardship will not be effective in protecting the health and safety of the community. The Commission expects and looks forward to continued participation in stewardship at the site well into the long term future.

Response B-2: DOE will modify §3.1 with the new proposed title, "Stewardship Program Implementation." This section will begin with general text and graphics explaining the functional relationship between DOE, regulators, and stakeholders. Three subsections will follow: *Role of DOE* (formerly §1.3); *Role of Regulators*; and *Role of Stakeholders*. Each subsection will present detailed explanations of roles and responsibility for all members of the Weldon Spring site stewardship community. DOE agrees with the list of stakeholders identified by WSCC in the comment.

The following table is proposed for inclusion in §3.1.

Weldon Spring Site Stewardship Organizations and Their Functions

Organization	Function
DOE Grand Junction Office	Compliance with DOE Orders and ARARs, legal responsibility, financial obligations, site monitoring and maintenance, document management, public participation and stakeholder issues
	Site stewardship program manager, site monitoring and maintenance, maintain public Interpretive center and information repository, public participation and stakeholder issues, local point-of-contact
EPA Region VII	Compliance with federal regulations
Missouri Department of Natural Resources (Division of Environmental Quality, State Parks Division)	Compliance with state regulations, access agreement for Katy Trail

Organization	Function
Weldon Spring Citizens Commission	Public representative, stewardship planning input, stewardship oversight, review annual and 5-year review reports, public meeting input
St. Charles County (Register of Deeds, Regional Planning Commission, Water Department)	Compliance with applicable county regulations, preservation of deeds, easements, parcel maps, zoning and use approvals, institutional controls oversight, well field contingency
Missouri Department of Health	Public health issues
Missouri Department of Conservation	Access agreements for department-owned property, party to ground water use restrictions
U.S. Department of the Army	Access agreements for department-owned property, party to ground water use restrictions
Francis Howell High School	Student and faculty representative, review annual and 5-year review reports, public meeting input
General Public	Stewardship oversight, public meeting input

- B-3 | 3. Section 3 of the July 2001 Stewardship Plan was also eliminated. For the Commission, Public participation is of great importance. The current document devotes one two-sentence paragraph that says virtually nothing. The public communication plan referred to in the text is generic and also says virtually nothing. The public includes both formal recognized groups such as the WSCC and the general public. Each has a separate yet integral role in stewardship. Public participation enriches the stewardship process and further ensures its long-term protectiveness. Failure of protective measures, such as the events that occurred at Love Canal, is less likely when the public is actively engaged in stewardship.

Response B-3: DOE agrees with this comment. See response [B-56](#) for the proposed revision to the public participation section of the LTS Plan.

- B-4 | 4. Figure 1-2 in the July 2001 Stewardship Plan should be included in this document. The figure identifies important decision points and where public participation input is necessary.

Response B-4: DOE will include the requested figure in the revised LTS Plan in section 3.1.

- B-5 | 5. This document discusses monitoring in perpetuity, but the plan favors the “five-year review” process. This plan must be appropriate and applicable for a much longer period than the 30-year period commonly associated with the CERCLA process. Annual, biannual, and/or intermediate reviews may be required at times. The “five year review” approach should not be adopted during the initial years of stewardship. During this time, incremental changes for many aspects of the plan may be required on a more frequent basis to ensure the plan is effective and adaptable.

Response B-5: The 5-year review establishes a maximum period between formal, comprehensive evaluations of remedy performance. Site monitoring and inspection will occur more frequently as part of routine stewardship operations. Additionally, DOE has established systems by which local authorities, stakeholders, and the public can notify DOE of site concerns. DOE presents this information in §3.3.1.

The word “Initially” will be deleted from the first sentence of §3.2.1 because the plan is to conduct annual inspections. The design basis for the disposal cell is to maintain its integrity for 1,000 years, or at least 200 years (40 CFR 192); therefore, stewardship activities are not constrained by the RCRA 30-year minimum post-closure requirement. Changes to inspection requirements would require a change of the LTS Plan in accordance with §3.1.

- B-6 | 6. The current plan does identify those areas requiring institutional controls (ICs). The Commission views this addition as very positive. However, ICs have been conceptually discussed for three years, and to date, an actual IC has not been developed even in a draft version. The Commission requests the creation of a timetable for the development of the ICs. In addition, the WSCC suggests workshops with DOE representatives and Missouri real estate, zoning and legal authorities. These authorities can provide appropriate guidance specific to the applicability and enforceability of ICs in Missouri. Other Federal agencies that have experience with ICs that DOE might wish to invite to the workshop or consult include the USACE and the General Services Administration.

Response B-6: DOE agrees that the issue of institutional controls should be further addressed during a public focused work session and will organize one on this topic this fall. The next version of the LTSP which is expected to be issued in early 2003 will contain proposed restrictive language for inclusion in institutional control mechanisms.

- B-7 | 7. There is also an additional issue of security. The Commission would like to see a formal evaluation of the potential for terrorist attacks, current and planned security and security issues at the site. In addition, define the perimeter of the security system and any agreements made with local, state, and federal authorities.

Response B-7: Site security measures include frequent surveillance activities (inspections and monitor well sampling) and observations by the public. The site security perimeter is the riprap-covered surface of the disposal cell. DOE-GJO has a rapid radiological event response team. DOE will continue to inform local responders of site characteristics and hazards. DOE is evaluating the potential for terrorist threats and will address this in the next version of the LTS Plan.

WSCC Specific Comments on the Information Presented

- B-8 | 1. Acronyms, page vii – UMTRCA, WSCC, and WSSRAP definitions should be added.

Response B-8: By convention, the acronyms list provides all acronyms that are used in the text of the document. These and other acronyms will be added to the list if they are used in the final LTS Plan.

- B-9 | 2. Section 1.1, page 1-1, second paragraph, first sentence– The meaning of the first sentence is not clear. GJO indicates they will consult with EPA and MDNR. All stakeholders, including agencies present at the June 5, 2002 meeting, recognized formal citizen’s groups such as the WSCC and the general public should be identified and consulted as well.

Response B-9: The text regarding concurrence in the LTS Plan is consistent with CERCLA guidance. However, EPA will not act, per CERCLA guidance, until DOE has demonstrated a reasonable attempt to achieve community acceptance. Applicable sections of the LTS Plan, including §3.12 (see response [B-56](#)) will be revised to clarify the role of stakeholders in the approval and revision process of the LTS Plan.

- B-10 | 3. Page 1-3, top of page – The document states that UMTRCA guidance was used to prepare this document. The Commission believes this is inappropriate. Why was this the basis for the Weldon Spring Stewardship Plan? Most UMTRCA sites are out west where the climate is very dry, vegetation is limited and population and urban growth is minimal. What makes UMTRCA sites, other than the presence of radioactive material, similar to Weldon Spring?

Response B-10: The UMTRA site guidance was developed to be applicable to any site in long-term stewardship where low-level radioactive contaminants are addressed. The guidance cites specific requirements for UMTRCA site licenses. These are the only low-level radioactive waste disposal sites for which specific post-closure requirements are codified in federal regulations. DOE has evaluated all stewardship guidance documents to date. Per direction from DOE Headquarters, the Weldon Spring Site is also adopting the August, 2002 Long-term Stewardship Planning Guidance for Closure Sites

The LTSM Program has followed the UMTRCA guidance for preparation of stewardship plans for sites in a variety of climates and settings. The overarching goals for stewardship at Weldon Spring are the same as for any remediated processing site—to maintain effective containment and control exposure to hazardous materials. Accomplishing these goals requires blending the elements of stewardship presented by government agencies and stakeholder groups (e.g., public participation, regulator oversight, monitoring, maintenance, and records management). The Weldon Spring LTS Plan also addresses site-specific conditions, including the urban setting and local climate.

- B-11 | 4. Section 1.3 describes the Role of DOE – There must also be a discussion of stakeholders – who they are and what their responsibilities are. See General Comment 2.

See response [B-2](#).

- B-12 | 5. Section 2.1.1 discusses property ownership and Fig 2-2 shows some of the property owners. Property ownership along Hwy D and the property boundaries for the Francis Howell High School and MDOT should be shown – Ownership

should include, Dept of Conservation, MDOT, Francis Howell School District, DOE and a “private ownership” category (there are at least a few along HYW D, Weldon Spring Heights and Weldon Spring). All of these areas should be clearly shown.

Response B-12: A map of this scale can easily become cluttered with too much information. We will agree to add “MDC” to the three named conservation areas and add “private ownership” to the area north of Highway 40/61.

- B-13 | 6. Section 2 provides a very thorough description of the Site.

Response B-13: Comment noted.

- B-14 | 7. Section 2 reviews in detail the areas requiring ICs – As previously requested by the Commission, Frog Pond and the Southeast Drainage are included! The area directly south of the Slough, especially those areas immediately adjacent should be considered for ICs. Without ICs, activities such as construction, excavation or groundwater removal could take place and could impact the redox zone or result in increased movement of contaminants south of the slough or into the slough itself. Wording is not precise and the last item, “quarry ground water” may cover this possibility. If so, the text should be clarified.

Response B-14: Institutional controls are planned for the areas described in this comment. Proposed restrictive language will be included in the next version of the LTSP. Additionally, a focused public work session is expected to further discuss institutional controls. DOE does not intend to impose specific restrictions on construction or excavation south of the slough.

- B-15 | 8. Section 2.3.1, page 2-14, second paragraph – What is the basis for the selection of the “300 foot” buffer zone? There appears to be a clear distinction between the ICs for areas within the zone and outside of the zone. Those within the zone will continue under DOE ownership and those areas outside will have appropriate ICs? The Commission has previously been told that DOE will maintain ownership of the entire Chemical Plant site and the Quarry – is this not true. Please explain and clarify the text.

Response B-15: The basis of the “300 foot” buffer zone is the MDNR regulation 10 CSR 25-7.264(2)(N)2.L. which requires “a minimum of 300 feet between the property line of the disposal facility and the permitted area.” This regulation was listed as an ARAR in the Chemical Plant ROD.

The Chemical Plant and the Quarry will remain under DOE ownership and the text will be revised and clarified to reflect that.

- B-16 | 9. Section 2.3.1, page 2-14, para. 3, last sentence and para 4, last sentence – DOE cannot just pursue an agreement with the landowner but “must have” an agreement with the landowner. What type of agreements with the landowners?

Response B-16: The sentence will be revised to change “pursue” to “obtain”.

- B-17 | 10. Section 2.3.1, page 2-14 and 2-15, discussion of Southeast Drainage and Frog Pond culverts – Text states that if future roadway modifications result in access to the culverts, DOE will try and remove the culvert. How will MDOT, pertinent county road people or utility people be made aware that contamination is present? How will this be documented to insure that everyone is aware of this?

Response B-17: Communication will be made with the Missouri Department of Transportation as to the nature and extent of contamination in the Southeast Drainage and Frog Pond Outlet culverts and the proper DOE point of contact for any issues pertaining to these areas. Annual routine site inspections will include an evaluation of the Southeast Drainage and Frog Pond Outlet culvert areas to ensure that the areas remain undisturbed. Also refer to section 3.7 “Frog Pond Outlet Culvert,” which will be modified to include the Southeast Drainage culvert.

- B-18 | 11. Section 2.4.1.1, page 2-20, second para – The text is not accurate, please revise. The text states that mobility of uranium is reduced at the chemical plant due to precipitation and adsorption. Reduction of the mobility of uranium due to precipitation has not been previously mentioned regarding groundwater at the Chemical Plant. Precipitation of uranium usually requires reducing conditions and reducing conditions have not been previously been mentioned at the Chemical Plant. Previous reports have indicated that conduit flow is the primary mechanism for groundwater movement

and due to the lack of conditions conducive to natural attenuation, dispersion and dilution were the most likely mechanism attenuating the contaminants at the Chemical Plant. Please clarify the precipitation of uranium at the Chemical Plant.

Response B-18: DOE acknowledges previous investigations of uranium behavior in raffinate pit leachate. In §5.2.1 of the Remedial Investigations of the Ground Water Operable Units at the Chemical Plant and Ordnance Works Area, Weldon, Spring, Missouri, DOE stated that uranium probably did not precipitate in raffinate sludges but did adsorb to overburden materials. DOE will revise the text to read, “The concentration of uranium in Chemical Plant area ground water was limited because uranium in raffinate pit leachate was partially adsorbed to materials in the saturated overburden.”

WSCC Specific Comments (continued)

- B-19 | 12. Section 2.4.1.1, page 2-23 – Based on the documents the Commission have reviewed, the text is not accurate. The discussion of TNT indicates that nitroaromatic compounds are not persistent in the environment and that groundwater characterization showed biotransformation was affecting nitroaromatic concentrations. Nitroaromatic compounds are generally considered fairly stable and persistent. Nitroaromatics aren’t easily biotransformed, especially in the oxygen-rich environment at the Chemical Plant. Historic concentrations of nitroaromatics in the groundwater do not appear to suggest significant biotransformation. Except for the increase near Frog Pond, concentrations of nitroaromatic compounds at the Chemical Plant over the past 3 to 4 years have been stable with some slight decreases. Have concentrations of the amino-DNTs been substantially high to suggest biotransformation is significant? The decrease in the concentration as distance increases from the source area is most likely due to dispersion and dilution. These are the primary mechanisms that have previously been cited as attenuating mechanisms at the Chemical Plant. What degradation products are you referring to and at what concentrations? Please clarify this portion of the text.

Response B-19: Nitroaromatic compounds are persistent in the shallow aquifer at the chemical plant as evidenced by the concentrations observed in the Frog Pond area and locations in the northern portion of the site. The primary attenuation mechanisms are dilution and dispersion, however, some biotransformation does occur in the subsurface. Elevated levels of 4-amino-2,6-DNT (maximum = 24 µg/l) and 2-amino-2,6-DNT (maximum = 16 µg/l) are present in the shallow aquifer. Water collected from a buried culvert approximately 6 feet below grade had higher concentrations than groundwater (4-amino-2,6-DNT = 470 µg/l and 2-amino-4,6-DNT = 820 µg/l). DOE offers the revised paragraph as follows:

“Nitroaromatic compounds occur in the groundwater system coincidental with former production line locations. The presence of nitroaromatics in groundwater is a result of leakage from former TNT and DNT process lines, discharges from wastewater lines, and leaching from contaminated soils and waste pits. The distribution of nitroaromatic compounds in the shallow aquifer is controlled by several processes, such as transformation, adsorption, desorption, dilution, and dispersion. The primary attenuating mechanisms are dilution and dispersion. The mobility of nitroaromatics is high due to their low distribution coefficients. Biotransformation processes also affect the distribution of nitroaromatic compounds in the subsurface. Microorganisms indigenous to the soils and the shallow aquifer have the ability to transform and degrade TNT and DNT (DOE 1997b). The presence of nitroaromatic compound breakdown products (4-amino-2,6-DNT and 2-amino-2,6-DNT) in the shallow aquifer indicate that degradation of TNT and DNT is occurring.”

- B-20 | 13. Section 2.4.1.2, page 2-23, biotransformation of nitroaromatics – Based on documents reviewed, the text is not accurate. Concentrations of the nitroaromatics are very low and only two locations exceed 0.11 ug/L. Is there actual evidence of biotransformation? Anaerobic biotransformation of nitroaromatics is more common than aerobic biotransformation, but is this really a significant factor in the attenuation of nitroaromatics at the Quarry?

Response B-20: During the remedial investigation (1994), groundwater in the quarry area was analyzed for nitroaromatic breakdown products. The presence of nitroaromatic compound breakdown products (4-amino-2,6-DNT and 2-amino-2,6-DNT) in the rim wells and some wells north of the slough indicate that degradation of TNT and DNT is occurring.

- B-21 | 14. Table 2-4, page 2-24 – Shouldn’t the GWOU be added to 2,4-DNT and shouldn’t the QROU be added to total uranium under the column “applicable occurrence”?

Response B-21: Yes and no, respectively. See response to [B-46](#).

- B-22 | 15. Section 2.4.3.2, page 2-32, para 2 – Please state in the text what the background concentration of uranium is for the Quarry. It's different than the background concentration for the Chemical Plant. The background concentration for uranium at the Chemical Plant was previously identified and the reader might assume that background concentrations for both areas are the same.

Response B-22: The average background concentration for uranium in the Missouri River alluvium is 2.77 pCi/l. This value will be inserted into the subject text.

- B-23 | 16. Page 2-39, para 1 end of the paragraph – The text suggests that all surface water locations were confirmed as clean – what do you mean by “clean”? Does this discussion pertain to just those areas mentioned or to all surface water locations at the Chemical Plant. Please clarify. Risk assessment information would be helpful here.

Response B-23: The text refers to soil remediation in the context of potential ground water contaminant source areas. This is the work accomplished under the Chemical Plant Operable Unit Record of Decision. The second to last sentence of the paragraph will be revised to indicate that the Chemical Plant area was remediated in accordance with the ROD and confirmed to meet project standards for contamination in soil during 2000.

- B-24 | 17. Section 2.6, page 2-41, para.3 – last sentence – Aren't there some locations along Hwy D that are in private ownership (residences)? How will DOE keep land use recreational? Could owners of residential property sell their property to someone who has the intentions of building a plant/tree nursery with a well for irrigation purposes? Could withdrawal of water for this purpose cause any changes in the movement or migration of contaminants?

Response B-24: There are no private residences along Highway D that are within the proposed boundaries for institutional controls. One residence exists that is owned by the MDC and houses their site manager's family. Institutional controls, which will run with the land, will be imposed to restrict groundwater use and be recorded on real estate deeds.

- B-25 | 18. Section 2.6, page 2-41 – There is no mention of ICs for the area south and immediately adjacent to the slough. See comment 6 above.

Response B-25: The text will be modified to describe the planned institutional controls south of the slough. Also see Table 2-12.

- B-26 | 19. Section 2.6, page 2-41, second to the last sentence – The text states that the IC will identify the appropriate authorities to enforce restrictions. Who are they and what if they won't accept this responsibility? Will they be identified in this plan?

Response B-26: Enforcement authorities will be identified when the appropriate institutional control mechanisms for each occurrence have been identified by DOE. The enforcement entity cannot be identified until the mechanism is found to be consistent with state real property law and other applicable laws and regulations and the instrument has been developed. The final institutional control instruments will identify the enforcement mechanisms and will be appended to the LTS Plan.

- B-27 | 20. Section 2.7, page 2-41, last sentence – Mention of the “Weldon Spring site records”, what are they and where will they be located? None of these documents are immediately available. Please provide the procedure for using the Freedom of Information Act to obtain documents and a schedule for when documents will be available on GJO's website and on-site at the Interpretive Center.

Response B-27: The Weldon Spring site record is the collection of site documents essential for post-closure care, and will be maintained at the Grand Junction Office. See response [B-58](#) for availability of site documents at the Interpretive Center, the local library, and on the internet. DOE will begin to make these documents available on the internet in January 2003. Freedom of Information Act requests are to be directed to:

Audrey Berry, Public Affairs Specialist
U.S. Department of Energy
2597 B ¾ Road

- B-28 | 21. Table 2-12 – This table is a good addition to the Plan. There are several comments (some have been previously mentioned). Why 300 ft for the buffer zone? Several ICs mention restricting use to recreational – could recreational use at these areas include such things as the construction and opening of a water park or amusement park? The presence of contamination should be posted at Burgermeister Spring and the Slough. The Commission believes the posting of signs in these areas should be performed for informational purposes similar to the “Right to Know” requirements. How will the ICs for Southeast Drainage and Frog Pond culverts work and will they hold up in an emergency (i.e., flood knocking out roadway, accident or fuel spill)? Restriction of groundwater use south of Katy Trail – does this include construction, excavation and groundwater removal for areas immediately south of the slough? This is the area outside of the buffer zone.

Response B-28: See response [B-15](#) for explanation of the buffer zone.

Allowable recreational uses will be driven by risk. DOE intends to allow the highest possible use of affected land. Consequently, if a proposed use will not result in unacceptable exposure to site contaminants, DOE would likely not object to that use. DOE will not recommend postings at Burgermeister Spring and Femme Osage Slough because institutional controls will control exposure by restricting use to acceptable exposure scenarios. For the Southeast Drainage, DOE will obtain concurrence from the owner to prohibit residential use within a 200-foot-wide zone centered on the drainage. For the County Route D culverts (Frog Pond outlet), DOE will obtain concurrence from the owner, the County, and utility owners to not excavate soils at this location without consulting with DOE. In both cases, DOE will inform affected parties of the institutional controls and will record them so they run with the land. DOE will remind affected parties of the institutional controls every five years and will visually inspect the affected areas annually. The text of the LTS Plan will be revised to better define terms such as recreational use.

WSCC Specific Comments (continued)

- B-29 | 22. Section 2.7.2, page 2-47 – Text mentions “as-built” drawings – are you referring to the original drawings of the Chemical Plant or as-builts of remedial action such as construction of the cell? Please clarify. When will the Report of Completed Action be finished? What and where is the “permanent site file”? This term is mentioned in many places in the text.

Response B-29: “As-built” drawings refer to final site conditions including the cell, final site grading, structures, monitor wells, and other site features. These drawings will be included in the Remedial Action Reports for each Operable Unit which are scheduled for completion through 2004. Copies of these drawings will be kept in the permanent LTSM Program records file for the Weldon Spring Site at the Grand Junction Office. The LTS Plan text will be modified to change the Record of Completed Action to Remedial Action Reports.

- B-30 | 23. Section 2.8.1, page 2-47 – The posting of signs with the 24-hour phone number is a very good idea. More signs with the 24-hour phone number should be posted along the Katy trail, near the slough and near Burgermeister Spring. Many of the people visiting these areas, may see something that should be reported and they may not see the signs at the cell.

Response B-30: There are no restrictions for the recreational visitor along the Katy Trail, at the slough, or at Burgermeister Spring, and there are no DOE facilities to disturb at those locations. Therefore, DOE does not plan to install signs at those locations.

- B-31 | 24. Section 3.1, page 3-1, para. 1, last sentence – the County and the public should also be able to provide input to the changes to the LTS Plan – they are the ones who will have to live with the changes. Information should be provided here or elsewhere to indicate how the County and the public would participate in this process.

Response B-31: DOE will hold annual site status meetings with the public. Proposed changes to the LTS Plan will be discussed at those meetings. §3.1 and 3.12 will be revised to indicate that the stakeholders, including the County and the public, will be involved in the change process. Please see the proposed LTS Plan revision procedure in Response [E-2](#).

- B-32 | 25. Section 3.2.1, page 3-1, last para – Discussion of 5-year review process. The Commission has previously made several comments related to the 5-year review process. See General Comment 5. How can changes be made in between the

5-year reviews? How does the community participate in this process? What is the lag time between collection of a sample and the notification of problems to the WSCC or public? Please provide an estimate of the lag time and incorporate analytical turnaround time and data validation. The WSCC hopes to see the data within 60 days.

Response B-32: DOE will hold annual site status meetings with the public. Proposed changes to the LTS Plan will be discussed at those meetings. §3.1 and 3.12 will be revised to indicate that the stakeholders, including the County and the public, will be involved in the change process (see Response [E-2](#)).

Due to the extensive network of ground water monitoring wells and the varying frequencies that samples are collected, ground water sampling activities occur throughout the year. The process of validating analytical data begins when the data are received from the laboratory. Following validation, the data are entered into a database and on the web. Therefore, the public will have access to the data through the web within approximately 60 days after laboratory analyses are completed. Also, annual monitoring results and historical trend analyses will be included in the annual report which will be posted on the web.

If contaminant concentrations indicate an upward trend, or if concentrations downgradient of affected areas exceed EPA limits, DOE will evaluate the source and transport mechanism as described in §3.9.2. If the evaluation indicates a potential impact to the public or the environment, DOE will make notifications in accordance with section 3.9.2.1.

- B-33 | 26. Table 3-1, page 3-2 – There are several items in the table that beg the question “How does the public participate in this process?”. This includes monitor systems for notification of site concerns, monitor “local” groundwater use, and interact with regulators and stakeholders regularly. Will these questions be addressed somewhere in this document?

Response B-33: §3.12 will be revised to clarify how the public will be involved in the stewardship process. Also see response to [B-56](#).

- B-34 | 27. Section 3.2.2, page 3-3, para 2 – The text states that “inspectors will ensure that ICs will remain effective”. How will this be done? What are the procedures and who will do this?

Response B-34: Institutional controls will define allowed and prohibited land and ground water use. As indicated in §3.2.2, the site inspectors will inspect the site for unauthorized activities. Procedures for evaluation of these activities, follow-up inspections, and notifications are described in §3.3 and 3.7. Also refer to appendix D for additional information. With regard to use of the word “ensure,” DOE will revise this sentence to read, “Inspectors also will look for physical evidence of intrusion and violation of institutional controls ((see also [Response A-156](#)).

- B-35 | 28. Section 3.2.2, page 3-3, para 3 – The text states that the area within 0.25 miles will be evaluated – What is the basis for 0.25 miles? Why not 0.2 or 1.0 mile?

Response B-35: There is no regulatory requirement for inspecting the area within 0.25 mile of the Chemical Plant and quarry properties other than the areas that will be inspected for adherence to institutional controls. At most LTSM Program sites, approximately 0.25mile of the surrounding area can be observed from the DOE property for the activities listed in the third paragraph of §3.2.2, and this has been a useful process in monitoring changes that might affect the protectiveness of the sites. Because institutional control areas will be inspected, the designated distance of 0.25 mile will be removed from the LTS Plan; however, inspectors will note changes in the areas adjacent to DOE property that potentially could have adverse impacts on the sites.

- B-36 | 29. Section 3.2.5 – The text states that the final report will be on the Internet. On which web site? Is it planned to have a Weldon Spring specific web site? This would certainly enhance the position of the Interpretive Center. Will the public be made aware of problems as they occur? The local community should not have to wait until the final report is issued if problems that may affect them are encountered.

Response B-36: A menu is provided at the website listed in §3.2.5 that will take the user to the Weldon Spring page.

DOE is responsible for maintaining protectiveness of public health and the environment. Potential occurrences that could impact public health and the environment, and associated responses and notifications, are provided in §3.9 through §3.9.2.2. These sections will be revised to indicate how soon the appropriate authorities are notified in the event DOE identifies an emergency or potential problem.

- B-37 | 30. Section 3.3 – Who determines “threatening or unusual site conditions”? Who, locally, will be informed of these conditions and how soon after they are discovered? Who decides if these conditions are worthy of further action? Will a record (log) be maintained and published?

Response B-37: As discussed in §3.3.1, LTSM Program personnel will evaluate unusual conditions that are reported by site inspectors or by anyone else who observes changes or unusual conditions at the site. The fourth paragraph of §3.3.1 will be revised to indicate that if an observed condition or activity threatens or compromises institutional controls or poses a risk of exposure to or release of known contaminants, DOE will notify the county in addition to the EPA and MDNR, and may contact the Department of Health if appropriate. DOE will include information about notifications and the result of follow-up confirmation in annual reports.

- B-38 | 31. Section 3.3.1, page 3-5, para 4 – When will the public be notified of incidents that pose a risk and who will be notified? The text states that DOE may request local assistance. Local authorities and the public **MUST** be notified if an incident poses a risk or a release occurs? Will a record (log) be maintained and published?

Response B-38: The seriousness of the occurrence will dictate the urgency of notifications. For example, a violation of a restrictive easement may not pose an immediate risk to public health or the environment, and the problem may be corrected before any risk of exposure occurs. However, if DOE determines that an occurrence poses a risk of exposure to or release of known contaminants, appropriate authorities will be notified. The fourth paragraph of §3.3.1 will be revised to clarify this point.

- B-39 | 32. Section 3.3.3, page 3-6 – The County and the WSCC should also receive some kind of report for follow-up inspections. Where will the routine inspection reports be located for review?

Response B-39: §3.3.3 will be revised to indicate that if a follow-up inspection is required for an occurrence that poses a risk of exposure to or release of known contaminants, a follow-up inspection report will be prepared within 60 days of the inspection and submitted to EPA, MDNR, and the county, and the public will be notified of its availability via posting on the LTSM website. Copies of the report will be available to the public upon request.

- B-40 | 33. Section 3.5, page 3-6, last para on page - Define, explain and support the following statement made in this paragraph: “DOE will increase on-site monitoring to reflect diminishing transient drainage water production.”

Response B-40: DOE points out that the LTS Plan reads, “DOE will *decrease* on-site monitoring...” Transient drainage is pore water expelled from the cell by the weight of overlying material. The cell is dewatering as designed, as indicated by a steadily decreasing rate of leachate production. Flow rates are expected to be insignificant 10 years from now. As the leachate flow continues to decrease and the sump fills at a slower rate, the time interval between pumping of the leachate sump will increase and, as indicated in the third paragraph of §3.5, the frequency for corresponding flow monitoring and leachate sampling requirements will decrease.

- B-41 | 34. Section 3.6.1, Page 3-8, top of page – “The LTSM Program may modify the ground water sampling and analysis plan to address LTS needs.” What does this mean – the EPA, MDNR, County and the WSCC must be consulted?

Response B-41: The third paragraph of §3.6.1 says that current ground water monitoring will continue to be conducted in accordance with the site *Environmental Monitoring Plan*. As explained in §3.6.1.2, the ground water monitoring plan may change based on the approval of the Ground Water Operable Unit Record of Decision, and the LTS Plan will be revised accordingly. Some details in operating procedures (e.g., locations, frequency, methods, quality assurance, data reporting) for sampling and analysis may change if remedy compliance monitoring requirements differ from the current sampling and analysis plan. Stakeholders will be part of the approval process for both the GWOU ROD and revisions to the LTS Plan.

- B-42 | 35. Section 3.6.1, Page 3-8, second para – “Unexpected results will be noted immediately.” What does this mean? Will someone be notified or does this statement just mean it will be written down in the field notes? Define the specific procedures that must be followed. How will the “lag time” be handled (See Comment 24).

Response B-42: The process of validating analytical data begins when the results are received from the laboratory. Unexpected results will be evaluated by DOE as soon as they are identified during the validation process. Following

validation, the data are entered into a database and on the web. Therefore, the public will have access to the data through the web within approximately 60 days after laboratory analyses are completed.

If contaminant concentrations indicate an upward trend, or if concentrations downgradient of known affected areas exceed EPA limits, DOE will evaluate the source and transport mechanism as described in §3.9.2. If the evaluation indicates a potential impact to the public or the environment, DOE will notify the appropriate authorities.

WSCC Specific Comments (continued)

- B-43 | 36. Section 3.6.1.1, page 3-8, table 3-4 – explain the basis for fluoride and discuss in the site history as applicable.

Response B-43: Fluoride was used in the uranium refining process and was ultimately discarded with the raffinate into the raffinate pits. Fluoride monitoring of the disposal cell leachate was conducted during the sludge stabilization process placement and for several years after. No elevated fluoride was ever observed. The appropriateness of fluoride monitoring in the groundwater as an indicator parameter for cell performance is being reviewed.

- B-44 | 37. Section 3.6.1, page 3-8, para 2 after Table 3-4 – “Compliance monitoring will begin when results from two consecutive detection monitoring...” – what if the increase is extremely high? Will DOE wait for two consecutive monitoring periods?

Response B-44: Due to many hydrologic factors, individual sample results can vary substantially between sampling events. Contaminant trends are determined when results from each sampling event are combined with historical data. Two successive sample results indicating a significant increase over the baseline concentrations may signal a trend change and, therefore, would be the trigger for compliance monitoring and possible corrective actions.

Extremely high results will be evaluated using similar contingencies identified in section 3.9.2.1. The text in section 3.6.1 will be revised to include reference to the groundwater contingencies. If the evaluation indicates a potential impact to the public or the environment, DOE will notify the appropriate authorities.

- B-45 | 38. Section 3.6.1.2, page 3-8 – The discussion of contingencies throughout the document is thorough and well thought-out, but will there be contingencies for Burgermeister Spring or the Slough?

Response B-45: The last paragraph of §3.9.2.1 addresses contingencies for springs. Also see response to B-48.

- B-46 | 39. Section 3.6.1.3, 3-9, para 5 –Would 300 ug/L for uranium be protective if something happens to the redox zone and additional uranium is release? If you’re using 0.11 ug/L for DNT, why aren’t you using 20 pCi/L for the uranium?

Response B-46: The vulnerability of the St. Charles County well field to impact from groundwater originating from the quarry has been the focus of several studies performed. It was determined from these studies that recharge from the area of impact accounts for less than 1% of the total flow through the St. Charles County well field. Under current conditions, the groundwater north of the slough poses no imminent risk to human health from water obtained from the well field. If after attainment of the target level of 300 pCi/l, attenuation mechanisms (i.e., precipitation and adsorption) were to become ineffective, the increase to the well field would be 3 pCi/l. Future conditions are expected to be similar to current conditions, if not better, because the source of contamination has been removed.

The chemical specific ARARs are presented in the *Record of Decision* for the Quarry Residuals Operable Unit. Chemical ARARs set concentration limits or ranges in various environmental media for specific hazardous substances, pollutants, or contaminants of concern. The quarry groundwater north of the slough is impacted; however, it is not considered to be a useable groundwater source. Conversely, the Missouri River alluvium south of the slough, which includes the well field, is currently not impacted and is presently being used as a potable water source. Because quarry groundwater north of the slough is not a useable source, groundwater standards are not considered as ARARs for that groundwater. However, in the unlikely event of contaminant migration into the useable groundwater source south of the slough, groundwater standards would be evaluated for any future remediation action.

Consistent with the remediation goals outlined in the Record of Decision, the goal of the long-term monitoring being performed for groundwater north of the slough is to observe reduction in the uranium concentrations so that the amount of uranium that could potentially migrate to the St. Charles County well field is likewise reduced. Therefore, a

target concentration equivalent to 10% of the maximum concentration would present a 90% reduction of the amount that could potentially migrate. The approach is considered to provide further protectiveness to the St. Charles County well field in addition to the already protective conditions that currently and will continue to exist. The recently promulgated MCL of 20 pCi/l for uranium as recently adopted as the trigger level south of the slough.

B-47 The Missouri water quality standard 2,4-DNT was selected as a target concentration for long-term monitoring of groundwater north of the slough. Currently, only a few data points exceed the Missouri water quality standards for groundwater. It is projected that these ARARs are likely to be met within a reasonable period time after implementation of this ROD.

40. Section 3.6.1.2, page 3-10, last para on page – The use of downward trends OR 300 ug/L is not appropriate. The word “or” should be changed to “and”. If you’re using 0.11 ug/L for DNT, why aren’t you using 20 pCi/L for the uranium? If monitoring ceases when concentrations north of the slough decrease to 300 ug/L, what happens if the redox zone is later disrupted and uranium is not held in the zone north of the slough (what if the process in the redox zone reverses?)?

Response B-47: At the quarry, there are only two contaminants of concern (analytes), uranium and 2,4-DNT. Other parameters are being monitored to evaluate the geochemical conditions of the quarry during the long-term monitoring program. An analyte can only be removed from the monitoring program if the 90th percentile of the data is below the target level (300 pCi/l for uranium or 0.11 ug/l for 2,4-DNT) AND downward trends in the subject analyte have been determined in all of the wells. The text states “and.”

Refer to the [response to comment B-46](#) regarding the use of 20 pCi/l and impacts to groundwater south of the slough should the reduction zone north of the slough no longer attenuate uranium.

The capability of this area to remain reducing is largely a function of the amount of organic material in the saturated alluvium. The reducing environment associated with the slough is the result of natural hydrological and biological processes that have been operating since the end of the last ice age, or at least 10,000 years. During that time, the Femme Osage stream channel likely meandered across the Missouri River flood plain. With the diversion of the Little Femme Osage and Femme Osage Creeks and the installation of the control gate at the confluence of the slough with the Missouri River, the slough can be considered a permanent hydrologic feature. As long as some portion of the reduced zone in the shallow alluvial aquifer remains saturated, it can be assumed that the reducing conditions will persist.

- B-48 41. Section 3.6.2.3, page 3-11 – Shouldn’t the surface water in the slough be monitored in case something changes in the redox zone? Signs should be posted at the Slough to inform fisherman and swimmers. Let the user decide if he or she wants to take the risk.

Response B-48: Radiological and chemical results from the surface water and sediment samples indicate that under a recreational scenario the potential risk estimated for the slough is within the acceptable risk range of 10^{-6} to 10^{-4} as presented in the *Baseline Risk Assessment for the Quarry Residuals Operable Unit of the Weldon Spring Site, Weldon Spring Missouri*. Based upon the acceptable risk range, no signs will be posted. The current levels of contamination in surface water and sediments from the slough have not affected ecological resources at these habitats and do not pose a future risk to biota at the site. The results from the risk assessment indicate that no action was warranted for the surface water and sediments in the Femme Osage Slough.

Changes in the redox zone would be identified through groundwater sampling sooner than by surface water sampling. Lack of attenuation of uranium would be indicated by upward trends in wells located along the slough. These wells typically indicate very low concentrations of uranium compared to those located closer to the quarry. Also, the geochemical sampling performed in these wells would also indicate changes from reducing to oxidizing. Changes in these parameters would trigger contingencies outlined in Section 3.9.2.2. Surface water monitoring of the upper portion of the Femme Osage Slough will be added to the LTS Plan in response to citizens’ concerns.

- B-49 42. Section 3.6.3, page 3-12, top of page – “DOE may modify the sump level monitoring frequency.” Will EPA, MDNR, the County and the WSCC be consulted?

Response B-49: Based on the trend of sump level monitoring results, it may be statistically appropriate to increase or decrease monitoring frequency. If DOE plans to modify the sump level monitoring frequency, the plan and its justification will be discussed at the annual site status public meeting.

- B-50 | 43. Section 3.6.4 – What events might trigger air monitoring? Shouldn't radon from the cell be monitored at least annually?

Response B-50: Radon measurements taken during construction of the cell cover verified that the radon/infiltration barrier as designed and constructed prevents radon emissions to the air. Also, radon gas does not build up in the cell because its daughter elements quickly decay to non-gaseous elements within the radon/infiltration barrier. As long as the integrity of the cell is maintained, therefore, measuring for radon emission on an annual basis is unnecessary. However, Table 3–6 lists the triggers that would require radon monitoring, which are biointrusion or settlement-induced cracking of the radon/infiltration barrier.

- B-51 | 44. Section 3.7, page 3-13, para 3 and 4 – Shouldn't DOE contact MDNR regarding new wells in the area more frequently than once every 5 years? The next paragraph states that inspectors will look for signs of excavation etc. on DOE property and south of quarry. Shouldn't they look for signs of excavation throughout the entire area? If a well is installed along the perimeter of either areas (but especially the Chemical Plant) and a substantial amount of water is withdrawn, couldn't the movement of contaminants increase, or, in the case of conduit flow couldn't water levels lower sufficiently to create new migration pathways.

Response B-51: DOE will inspect the areas affected by institutional controls on an annual basis to determine if they are remaining protective of human health and the environment. This will include indications of ground water withdrawal. DOE will respond immediately in cases of observed violations of restrictive easements and contact appropriate enforcement authorities. As long as the land in the affected areas remains undeveloped for residential or commercial use, the 5-year interval for checking state records for well registrations is appropriate.

The purpose for prohibiting excavation on DOE-owned property and the reduction zone is to make sure drainage patterns are not changed to protect the sites from erosion, and to not disturb the natural physical and chemical uranium reduction processes in the aquifer north of the slough. If the approved institutional controls for the Ground Water Operable Unit restrict excavations in areas outside of DOE property, then those areas will be inspected for signs of excavation also. The final LTS Plan will incorporate the Ground Water Operable Unit institutional controls.

Institutional control boundaries will be based on ground water analysis that will take into account the affects of production wells on the movement of contaminated ground water. Therefore, the boundaries will be far enough beyond the locations of contaminated ground water so that the area of influence of a production well located immediately outside the perimeter of a control boundary will not hydrologically impact the contaminated ground water.

- B-52 | 45. Section 3.9, page 3-14, para 3 – Who will be notified? Define the emergency situations that will require notification.

Response B-52: As stated in second paragraph of §3.9, an emergency would constitute “unusual damage or disruption” that threatens or compromises site safety or security. This paragraph will be revised to define an emergency as an occurrence that has the potential to expose the contents of the cell. The third paragraph of this section will be moved to the end of the second paragraph and revised to say that DOE will begin notifications to the EPA, state, and county as soon as an emergency situation is known to exist.

- B-53 | 46. Section 3.9.2.1, page 3-15, last para, last sentence and Section 3.9.2.2, para 4 – The WSCC and the public should be notified as well. A flow chart would be appropriate here.

Response B-53: DOE must work with local response authorities for public notification and will not notify the public directly.

- B-54 | 47. Section 3.9.2.2, page 3-15 – Reference should be made to page B-5, which shows there is a restrictive easement in the reduction zone. Restatement as to the importance of not disturbing the reduction zone is needed.

Response B-54: The discussion in Section 3.9.2.2 presents contingencies that will be implemented in the event that trigger levels are exceeded south of the slough or upward trends in data are observed north of the slough. Additional text on the importance of the reduction zone will be included in 3.6.1.3. This discussion will be tied to the geochemical monitoring that will be performed at the quarry.

- B-55 | 48. Section 3.11, page 3-19 – Will the State, County and public get to see the budget request before it goes before Congress? The WSCC would be glad to assist with the review of the budget request and will provide help to obtain the necessary funding using any means available.

Response B-55: The first public release of the budget is by the White House via the President's State of the Union address. However, as the budget request is being developed, DOE will work with stakeholders to understand their interests and seek public participation in establishing priorities.

- B-56 | 49. Section 3.12 – This section is of greatest importance to the WSCC and needs to be expanded. Please see General Comment 3 above. The document cited has been supplied to the Commission and found to seriously lack substance. The Public Participation portion of Stewardship Plan should not be obtained from another document unless that document addresses stewardship, stewardship decision points and public involvement in the entire stewardship process.

Response B-56: The proposed revision to §3.12 is as follows.

“3.12 Public Participation

Promoting involvement of the public in the stewardship process at the Weldon Spring site ensures that citizens' concerns are addressed and that relevant public information is provided. Active citizen involvement also promotes understanding of, and encourages informed participation in, the project by the general public. The LTSM Program seeks to encourage public participation by providing site-specific information via public contacts, DOE contacts, document reviews, and public meetings.

3.12.1 Contacts

The purpose of the contact effort is to ensure that public and key community leaders, including federal, state, and local government officials are kept informed of site activities and status changes. Contact information is maintained for, including

- Legislative and executive branch officials (federal, state, and local)
- U.S. Environmental Protection Agency, Region 7
- U.S. Department of the Army
- State of Missouri (departments of Natural Resources, Conservation, Health, and Transportation)
- St. Charles County
- Weldon Spring Citizens Commission
- Francis Howell School District
- Interested citizens
- Media (print and electronic)

This contacts list comprises the distribution list for the annual and the 5-year review report, and other site announcements and notifications.

3.12.2 DOE Contacts

Contact information for the DOE staff responsible for implementing the Weldon Spring site stewardship program will be posted at the Interpretive Center. Posting of such information should encourage the public to actively participate with DOE in the stewardship process by reporting sightings or concerns such as visible changes to the cell cover, erosion, suspicious land use, damaged monitor wells, or general occurrences of vandalism.

The DOE contact list will also serve an informational purpose by providing a mechanism for the public to submit questions or requests for information when there is no continuous on-site DOE presence. The following contact list will be maintained and revised on an annual basis, as necessary, to reflect the most current contact information.

- Pamela Thompson, LTSM Program Manager, Weldon Spring Site
U.S. Department of Energy
7295 Hwy 94 South, St. Charles, MO 63304

(636) 441-8978

- Carl Jacobson, LTSM Program Manager, DOE–GJO Technical Assistance Contractor
The S.M. Stoller Corporation
2597 B ¾ Road, Grand Junction, CO 81503
(970) 248-6568
- Grand Junction Office 24-Hour Telephone Contacts
(877) 695-5322
(970) 248-6070
- LTSM Program Website
<http://www.gjo.doe.gov/programs/ltsm>

3.12.3 Document Review and Public Meetings

Interested stakeholders as discussed in Section 3.12.1 will be notified of the availability of both annual and each 5-year review reports available to the public at the Interpretive Center, the Middendorf-Kredell branch of the St. Charles City-County Library System, and on the LTSM Program website. This notification will ensure that the public is made aware of site activities and changes. Comments and/or questions can be directed to the DOE contacts listed in Section 3.12.2.

To ensure a mechanism whereby the public can participate in periodic site reviews, a schedule for a public meeting will be included in the notification letter sent with each annual site inspection report and on the website. The annual meeting will include discussions of site stewardship activities and observations during the previous year, proposed changes to the LTS Plan, and public comments and concerns.”

See response B-4 concerning flowchart.

- B-57 | 50. Table 3-7 – Will more details of the ICs be provided in subsequent versions of this table when details are worked-out? Please see General Comment 6 above. Provide a schedule for development and completion of the ICs and demonstrate how ICs will work and interact with the State of Missouri, St. Charles County and St. Louis County.

Response B-57: Table 3-7 was not intended to address instruments for institutional controls. §2.6, Table 2-12, and Appendix B will be revised to incorporate approved institutional controls and associated instruments. See response to Comment B-6 for the plan for development and completion of institutional controls.

WSCC Specific Comments (continued)

- B-58 | 51. Section 3.13 – This section is not clear about what documents will be held where. The text states “the following documents may include the following...” The list needs to be determined – all are aware that changes may occur, but the use of the word “may” does not clarify anything. A list of all of the documents available to GJO should be maintained at the Interpretive Center and a short paragraph should be supplied to describe the larger documents.

Response B-58: §3.13 indicates that site stewardship records will be kept at GJO. The subsection “Access and Retrieval” will be revised to clarify which site documents will be physically located at the Interpretive Center and at the library, and what a user will find on the LTSM Program website for Weldon Spring. The website will be accessible from any internet-connected computer system.

Documents that will be located in the Interpretive Center for review will include current fact sheets, the current revision of the LTS Plan, all DOE site documents referenced in the LTS Plan, Records of Decision for the operable units, Remedial Action Reports, annual reports, follow-up or contingency inspection preliminary assessments and reports, corrective action plans and reports, and 5-year review reports.

Documents that will be located in the Middendorf-Kredell branch of the St. Charles City-County Library System will include the current revision of the LTS Plan, the Administrative Record Index, Records of Decision for the operable units, and annual and 5-year review reports.

The LTSM website will include the documents residing at the Interpretive Center and the library, in addition to the Administrative Record, site photographs and maps, and historical and current water quality analytical data. The web user will be able to query specific ground water monitoring data and generate tables and graphs from the data.

B-59 | 52. Table 3-6, page 3-17 – What are the criteria used to develop the response actions?

Response B-59: The cell and the leachate system, and their associated maintenance requirements, were designed to prevent the listed events. The response actions are established to evaluate and mitigate unexpected occurrences that fall outside the safety factors built into the design.

B-60 | 53. Section 3.13, page 3-22, top of page – Who will be notified of destruction of documents?

Response B-60: The LTSM Program will be notified prior to the destruction of any temporary records such as contracting and financial records. Temporary records are held only for specified time periods by law, and are not essential for long-term stewardship of the Weldon Spring site.

Memorandum

Weldon Spring Citizens Commission

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Date: August 28, 2002

To: Ray Plienness Deputy Manager
Grand Junction Office

USDOE

From: WSCC

Subject: Previous comments on Stewardship Plans for Weldon Spring Site

- **June 14, 1999** WSCC to Stephen McCracken, USDOE, WSSRAP
re: comment and review on the *Stewardship Plan for the Weldon Spring Site*, Revision A.
- **May 9, 2000** WSCC to Stephen McCracken, USDOE, WSSRAP
re: comments on *Weldon Spring Stewardship Document for Operations and Maintenance* (DOE/OR/21548-771) February 2000.
- **May 16, 2000** Stewardship Meeting Notes (WSCC, DOE, MDNR)
re: review and discussion of comments from WSCC May 9, 2000 letter to Stephen McCracken
- **November 7, 2000** WSCC to WSSRAP Project Director, USDOE, WSSRAP
re: specific comments on:
 1. *Weldon Spring Site Stewardship Document for Operations and Maintenance*, August 2000, Revision 0 (DOE/OR/21548-771)
 2. *Long-Term Monitoring and Maintenance Plan for the Weldon Spring Site*, August 2000, Revision (DOE/OR/21548-797)
 3. *Institutional Control Plan for the Weldon Spring Site*, July 2000, Revision 0 (DOE/OR.21548-836)
- **May 16, 2001** Pamela Thompson, WSSRAP to Richard Hampel, WSSC
re: response to WSCC Stewardship Comments of November 7, 2000
- **November 30, 2001** WSCC to Pamela Thompson, USDOE, WSSRAP
re: specific comments on *Weldon Spring Site Stewardship Document for Operations and Maintenance*, July 2001, Revision 1 (DOE/OR/21548-771)
- **August 21, 2002** Ray Plienness, USDOE, GJO to Richard Hampel, WSCC
re: response to WSCC Stewardship Comments of November 30, 2001

